

**UNITED STATES DISTRICT COURT:
SOUTHERN DISTRICT OF NEW YORK**

TAPP INFLUENCERS LLC, THE BLU
MARKET, INC., and STEVEN FORKOSH,

Plaintiffs,

v.

ESPIRE ADS LLC, KVRMA, LLC, LISA
NAVARRO, NATHANIEL CO, CHARLES
PUNAY, CPA VIRAL LLC, d/b/a TAPMOB,
and JASPER PANGILNAN,

Defendants.

Civil Action No.: 21-cv-11068
ECF Case
Hon. John G. Koeltl

AFFIDAVIT

Province

STATE OF

Ontario

City

) S.S.:

COUNTY OF

Hamilton

MICHAEL TRAN, being duly sworn, hereby deposes and testifies as to the following under the penalties of perjury:

1. I, non-party MICHAEL TRAN, am over the age of eighteen (18), of sound mind, and have personal knowledge of the matters set forth herein.

2. I have reviewed the documents authored by TAPP Co. in this matter [ECF 52-52], and respond as follows.

3. I have never worked as an officer, director, employee, and/or agent of any of the defendants in this matter, except as an influencer platform user, and I was likewise never directed by any of the defendants in this matter to mine trade secrets from TAPP Co.

4. Rather, in approximately July of 2021, representatives from TAPP Co. reached out to me to discuss switching from other platforms to their platform exclusively.

5. Nothing was discussed outside of an ordinary sales pitch; I never requested information on TAPP Co.'s business model, methods of monetization, promotion methods, identity of influencers, and/or other proprietary confidential information.

6. However, TAPP Co. sent me regular third-party influencer onboarding instructions, as is standard in the industry for new platform users.

7. Further, I have never executed a non-disclosure agreement with TAPP Co.

8. In sum, I have never done the things I have been accused

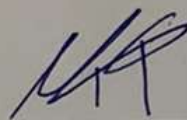


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of by plaintiffs, and I have not the slightest clue as to why my name is being mentioned in this litigation, as I have certainly never provided any business information to any of the defendants, nor was I asked to provide such information; rather, I am a mere third-party influencer and user of defendants' platforms.

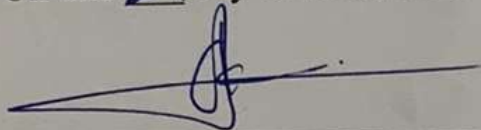
Dated: 24th June __, 2022

Further Affiant sayeth
naught.



MICHAEL TRAN

Sworn to and subscribed before me
On this 24 day of June, 2022



Notary Public

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THEODORA I. UBACHUKWU

Barrister, Solicitor & Notary Public
in and for the Province of Ontario.

My commission is of unlimited duration.
No legal advice given.

